

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MICHAEL J. BELLEAU,
Plaintiff,

v.

Case No. 12-C-1198

EDWARD F. WALL, ET AL.,
Defendants.

**JOINT MOTION FOR LEAVE TO FILE SUMMARY JUDGMENT MEMORANDA
NOT EXCEEDING 55 PAGES**

The parties, by undersigned counsel, respectfully move the Court for leave to file summary judgment memoranda not exceeding 55 pages in length for the following reasons:

1. The scheduling order in this matter sets February 16, 2015, as the date by which either party must file its summary judgment motion and supporting memorandum.
2. This district's Civil L. R. 56(b)(8) imposes a 30-page limit on the length of the principal memorandum supporting the summary judgment motion by each party.
3. The parties have conferred regarding the filing of summary judgment motions. Both sides intend to file motions and have agreed to file them on the same date, February 16, 2015, together with supporting memoranda.
4. The parties have also agreed to the submission of a joint stipulation of facts, consistent with Civil L. R. 56(b)(5), approximately 12 pages in length.
5. Based on the extent of the pretrial discovery that has occurred, to which numerous references will be made in the memoranda, the extent of the stipulated facts, and the number of major constitutional issues and affirmative defenses that have been raised, the parties' current preparations for their supporting memoranda indicate that an additional 25 pages, beyond the local rule's 30-page limit, may be needed to fully present relevant points in their arguments.
6. Accordingly, the parties jointly request leave to file supporting memoranda not to exceed 55 pages in length each.

Date: February 9, 2015

By: /James A. Walrath
James A. Walrath
State Bar No. 1012151
Law Offices of James A. Walrath, LLC
324 E. Wisconsin Ave., #1410
Milwaukee, WI 53202
(414) 202-2300
jw@jaw-law.com

/Laurence J. DuPuis
Laurence J. Dupuis
American Civil Liberties Union
of Wisconsin Foundation, Inc.
State Bar No. 1029261
207 East Buffalo Street, Suite 325
Milwaukee, WI 53202-5712
(414) 272-4032
ldupuis@aclu-wi.org

Attorneys for Plaintiff Belleau

Date: February 10, 2015

/s/Anthony D. Russomanno
ANTHONY D. RUSSOMANNO
Assistant Attorney General
State Bar #1076050
Email: russomannoad@doj.state.wi.us
(608) 267-2238
(608) 267-8906 (Fax)

/s/Abigail C. S. Potts
ABIGAIL C. S. POTTS
Assistant Attorney General
State Bar No. 1060762
Email: pottsa@doj.state.wi.us
(608) 267-7292
(608) 267-8906 (Fax)

Attorneys for defendants

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857